PCBs in Schools and Buildings

ISSUE SUMMARY:

PCBs in building materials, particularly in schools, continues to be a focus of political and press attention and heightened community concern in New England. The number and range of buildings and other structures identified with PCBs in manufactured building materials pose potential risks to building inhabitants including risk from exposure to unacceptable levels of PCBs in indoor air. Limitations in the regulatory framework for addressing PCBs in building materials complicates effectively managing this challenge.

UPCOMING MILESTONES:

BACKGROUND:

The federal PCB regulations at 40 CFR Part 761 establish requirements related to use, storage, cleanup, and disposal of PCBs. Enforcement of these regulations is not delegated to the states.

PCBs were used in numerous building products prior to their ban in 1979. The prevalence of PCBs in New England schools, especially in Connecticut, is well documented in information that has been provided to the Agency. For example, information obtained from Connecticut Department of Energy & Environmental Protection (CTDEEP) indicated that PCBs have been identified in more than 150 schools. CTDEEP has a robust PCB program (not federally delegated, but rather complementary to federal regulations) that includes inspection, enforcement (both state and referred to EPA), and state regulations that prohibit the continued use of any products (e.g. caulk) with concentrations above 1ppm.

The EPA's regulations prohibit the use of PCBs in building materials at levels greater than or equal to 50 ppm. Thus, when identified, these > 50 ppm PCBs are required to be removed and properly disposed of. Likewise, any contaminated surrounding materials need to be addressed. However, removal and disposal is costly and schools may not have available funding to remove and dispose of PCB contaminated building materials in an expeditious manner.

Further, under the current PCB regulations, there is no requirement to test for PCBs in building material. Generally, EPA cannot compel building owners to conduct sampling to determine if PCBs are present. EPA guidance recommends indoor air sampling as an initial test where PCBs in building material is suspected. Regardless of whether PCBs are known to be present, EPA recommends that all schools and other buildings built/renovated between 1950 and 1979 implement practical actions to minimize potential building occupant exposures to PCBs, including removing PCB-containing fluorescent light ballasts (FLBs) and implementing best management practices

KEY EXTERNAL STAKEHOLDERS:

☒ Congress ☐ Industry ☒States ☐ Tribes ☒ Media ☒ Other Federal Agency ☐ NGO ☒ Local Governments ☐ Other (name of stakeholder)

MOVING FORWARD:

For schools (and other building owners) where PCBs are identified, EPA Region 1 works with each school and related stakeholders to address the PCBs, mitigate exposures based on site specific needs and conditions, and comply with the PCB regulations.

LEAD OFFICE/REGION: REGION 1

OTHER KEY OFFICES/REGIONS: OLEM/OCSPP